

FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

FEB 21 2024

SEAN F. McAVOY, CLERK  
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Case No.: 2:24-CR-28-MKD

Plaintiff,

## INDICTMENT

V.

LANCE SCOTT MICHEL,

Vios: 18 U.S.C. §§ 2243(a), 1153  
Sexual Abuse of a Minor in  
Indian Country  
(Count 1)

Defendant.

18 U.S.C. §§ 1591(a)(1),  
(b)(2), 1153  
Child Sex Trafficking in  
Indian Country  
(Counts 2, 4)

18 U.S.C. §§ 2241(a)(1), (c),  
1153  
Aggravated Sexual Abuse of a  
Minor in Indian Country  
(Count 3)

18 U.S.C. §§ 2253, 1594  
Forfeiture Allegation

### The Grand Jury charges:

1 COUNT 1

2 Between on or about May 1, 2023, and May 31, 2023, in the Eastern District  
3 of Washington, within the external boundaries of the Confederated Tribes of the  
4 Colville Reservation, in Indian Country, the Defendant, LANCE SCOTT  
5 MICHEL, an Indian, did knowingly engage and attempt to engage in a sexual act  
6 with MINOR 1, a person who had attained the age of 12 years but had not attained  
7 the age of 16 years and was at least four years younger than LANCE SCOTT  
8 MICHEL, all in violation of 18 U.S.C. §§ 2243(a), 1153.

9 COUNT 2

10 Between on or about May 1, 2023, and on or about May 31, 2023, in the  
11 Eastern District of Washington, within the external boundaries of the Confederated  
12 Tribes of the Colville Reservation, in Indian Country, the Defendant, LANCE  
13 SCOTT MICHEL, an Indian, did knowingly recruit, entice, harbor, transport,  
14 provide, obtain, advertise, maintain, patronize, and solicit by any means a person,  
15 MINOR 1, knowing and in reckless disregard of the fact, and having had a  
16 reasonable opportunity to observe MINOR 1, that MINOR 1 had not attained the  
17 age of 18 years and would be caused to engage in a commercial sex act, in  
18 violation of 18 U.S.C. §§ 1591(a)(1), (b)(2), 1153.

19 COUNT 3

20 Between on or about May 1, 2023, and July 31, 2023, in the Eastern District  
21 of Washington, within the external boundaries of the Confederated Tribes of the  
22 Colville Reservation, in Indian Country, the Defendant, LANCE SCOTT  
23 MICHEL, an Indian, did knowingly engage in a sexual act with MINOR 2, a  
24 person who had attained the age of 12 years but had not attained the age of 16  
25 years and was at least four years younger than LANCE SCOTT MICHEL, by

1 using force against MINOR 2, all in violation of 18 U.S.C. §§ 2241(a)(1), (c),  
2 1153.

3 COUNT 4

4 Between on or about May 1, 2023, and on or about July 31, 2023, in the  
5 Eastern District of Washington, within the external boundaries of the Confederated  
6 Tribes of the Colville Reservation, in Indian Country, the Defendant, LANCE  
7 SCOTT MICHEL, an Indian, did knowingly recruit, entice, harbor, transport,  
8 provide, obtain, advertise, maintain, patronize, and solicit by any means a person,  
9 MINOR 2, knowing and in reckless disregard of the fact, and having had a  
10 reasonable opportunity to observe MINOR 2, that MINOR 2 had not attained the  
11 age of 18 years and would be caused to engage in a commercial sex act, in  
12 violation of 18 U.S.C. §§ 1591(a)(1), (b)(2), 1153.

13  
14 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

15 The allegations set forth in this Indictment are hereby realleged and  
16 incorporated by reference for the purpose of alleging forfeitures.

17 Pursuant to 18 U.S.C. § 2253, upon convicted of an offense in violation of  
18 18 U.S.C. § 2243 or 2241 as set forth in Counts 1 and 3 of this Indictment, the  
19 Defendant, LANCE SCOTT MICHEL, shall forfeit to the United States any visual  
20 depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this  
21 chapter, or any book, magazine, periodical, film, videotape, or other matter which  
22 contains any such visual depiction, which was produced, transported, mailed,  
23 shipped or received in violation of this chapter; any property, real or personal,  
24 constituting or traceable to gross profits or other proceeds obtained from such  
25 offenses; and any property, real or personal, used or intended to be used to commit  
26 or to promote the commission of such offenses, or any property traceable to such  
27 property.

1       If any such property, as a result of any act or omission of the Defendant:  
2           a. cannot be located upon the exercise of due diligence;  
3           b. has been transferred or sold to, or deposited with, a third party;  
4           c. has been placed beyond the jurisdiction of the Court;  
5           d. has been substantially diminished in value; or  
6           e. has been commingled with other property which cannot be divided  
7               without difficulty,

8       the United States shall be entitled to forfeiture of substitute property pursuant to  
9       21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

10       Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of  
11       18 U.S.C. § 1591, as set forth in Counts 2 and 4 of this Indictment, the Defendant,  
12       LANCE SCOTT MICHEL, shall forfeit to the United States of America any  
13       property, real or personal, involved in, used, or intended to be used to commit or to  
14       facilitate the commission of the offenses, and any property traceable to such  
15       property; and any property, real or personal, constituting or derived from, any  
16       proceeds obtained, directly or indirectly, as a result of the offenses, and any  
17       property traceable to such property.

18       If any of the property described above, as a result of any act or omission of  
19       the Defendant

20           a. cannot be located upon the exercise of due diligence;  
21           b. has been transferred or sold to, or deposited with, a third party;  
22           c. has been placed beyond the jurisdiction of the court;  
23           d. has been substantially diminished in value; or  
24           e. has been commingled with other property which cannot be  
25               divided without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute  
2 property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C.  
3 § 2461(c).

4 DATED this 21 day of February 2024.

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6 A TRUE BILL  
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11 Vanessa R. Waldref  
12 United States Attorney  
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15 Michael J. Ellis  
16 Assistant United States Attorney  
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